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Diana Van Bree

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DIANA VAN BREE,

Plaintiff,

vs.

JT4, LLC, a Delaware Limited
Liability Company,

Defendant.

Case No. 2:20-cv-00788-CDS-MDC

DIANA VAN BREE,

Plaintiff,

vs.

FRANK KENDALL III, SECRETARY,
UNITED STATES AIR FORCE,

Defendant.

Case No. 2:20-cv-01038-CDS-MDC

**STIPULATION AND REQUEST FOR
EXTENSION OF TIME OF REMAINING
DEADLINES IN REVISED JOINT
DISCOVERY PLAN AND SCHEDULING
ORDER (FIRST REQUEST)**

1 In accordance with LR IA 6-1, Plaintiff Diana Van Bree (“Plaintiff”), as well as Defendants
2 JT4, LLC (“JT4”) and United States Air Force (the “Air Force”) (“Defendants”) (collectively the
3 “Parties”), by and through their respective counsel, hereby stipulate and request an extension of the
4 deadlines in the Revised Joint Discovery Plan and Scheduling Order (ECF No. 89). For the
5 following reasons, the Parties respectfully request an additional sixty (60) days for all remaining
6 deadlines. This is the first stipulation for extension of time of deadlines outlined in the Revised
7 Joint Discovery Plan and Scheduling Order but the second stipulation for extension of time related
8 to the Revised Joint Discovery Plan and Scheduling Order generally.
9

- 10 1. On May 31, 2024, Plaintiff propounded written discovery requests onto the Air Force and,
11 separately, letter correspondence to JT4, requesting responses to previously propounded
12 written discovery requests.
13
- 14 2. On June 3, 2024, the Air Force filed a Motion to Appear, Substitute, and Withdraw
15 Attorney of Record, (ECF No. 91), wherein this Court and the Parties received notice of
16 new counsel of record for the Air Force.
17
- 18 3. Shortly thereafter, the Air Force raised concerns about Plaintiff’s written discovery requests
19 to Defendants seeking sensitive and classified information that required a certain level of
20 security clearance, and requested to meet and confer about the issue, along with other
21 anticipated motion practice.
22
- 23 4. On June 7, 2024, the Parties telephonically met and conferred about the written discovery
24 issue and other case-related matters. The Air Force notified the Parties of the anticipated
25 length of time (several months to one year) to process applications for the security
26 clearance level necessary to access and review the information responsive to Plaintiff’s
27 requests and suggested a stay of all deadlines to allow for such processing. Plaintiff
28

expressed concern, and subsequently disagreed with the need for a stay given the potential for alternatives.

5. The Parties continued to meet and confer via email during the week of June 10, 2024, and ultimately agreed to jointly stipulate to a 60-day extension of all remaining deadlines to allow Defendants to file an appropriate Motions related to its concerns regarding classified information responsive to discovery, while also permitting discovery to move forward as appropriate and to the extent possible given the above security clearance issues. The Parties also agreed to a 60-day extension, to August 30, 2024, for the Defendants to respond to Plaintiff's respective written discovery requests to Defendants that were due on July 1, 2024.

This request for extension is made in good faith, with good cause shown, and is not intended to cause unnecessary delay in the processing of this matter. Therefore, for the aforementioned reasons, the Parties respectfully request an extension of **sixty (60) days**, of all remaining deadlines in the Revised Joint Discovery Plan and Scheduling Order as follows:

<u>Revised Joint Discovery Plan and Scheduling Order</u>	<u>Current Date</u>	<u>Requested Date</u>
Discovery Cut-Off	August 16, 2024	October 15, 2024
FRCP 26(a)(2) Disclosures (Expert & Reports)	June 17, 2024	August 16, 2024
Disclosure of Rebuttal Experts & Reports	July 17, 2024	September 16, 2024
Dispositive Motions	September 16, 2024	November 15, 2024
Pretrial Order	October 16, 2024	December 16, 2024

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DATED: June 17, 2024

/s/James A. Hill

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Counsel for Defendant JT4, LLC

ORDER

For future filings, the placement of the signature block must comply with LR IA 6-2.

IT IS SO ORDERED

Dated: 6/20/24



Hon. Maximiliano D. Couvillier III
United States Magistrate Judge